

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**KIMBERLY ARCHEY,**

Plaintiff;

vs.

**BFL-MGMT., INC. d/b/a  
BUY FOR LESS,**

Defendant.

**Case No. CIV-17-533-SLP**

*(Formerly Oklahoma County  
Case No. CJ-2017-2207)*

**JOINT MOTION TO EXTEND SCHEDULING ORDER**

Plaintiff Kimberly Archey and Defendant BFL-MGMT., Inc. d/b/a Buy for Less, (collectively “Parties”) jointly request this Court enter an Order extending the current scheduling order [Doc. No. 12] deadlines sixty (60) days. In accordance with LcVR 7.1(h), the Parties state:

1. No requests for an extension have been made prior to this filing;
2. The Parties request this extension because the Parties do not believe discovery will be complete prior to the current scheduling order deadlines. The Parties have engaged in discovery thus far, but the Parties anticipate needing additional discovery and are in the process of scheduling depositions that will extend beyond the currently set scheduling order deadlines. Scheduling conflicts and newly discovered information in the case have prevented the Parties from being able to meet the current set deadlines.
3. All parties agree to the requested extension.
4. The Parties set forth the following remaining deadlines and the proposed new deadlines:

	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Plaintiff to file final list of expert witnesses in chief and submit expert reports to Defendant	3/20/2018	5/20/2018
Defendant to file final list of expert witnesses in chief and submit expert reports to Plaintiff	4/18/2018	6/17/2018
Plaintiff to file final list of witnesses together with addresses and brief summary of expected testimony where a witness has not already been deposed	5/10/2018	7/09/2018
Defendant to file a final list of witnesses (as described above)	5/24/2018	7/23/2018
Plaintiff to file a final exhibit list	5/10/2018	7/09/2018
Defendant to file objections to Plaintiff's final exhibit list, under Fed R. Civ. P. 26(a)(3)(B)	5/24/2018	7/23/2018
Defendant to file a final exhibit list and any exhibits not previously submitted	5/24/2018	7/23/2018
Plaintiff to file objections to Defendant's final exhibit list under Fed R. Civ. P. 26(a)(3)(B)	6/07/2018	8/06/2018
Discovery to be completed	8/15/2018	10/14/2018

All dispositive and Daubert motions to be filed	5/01/2018	6/30/2018
Trial Docket	September 2018	November 2018
Designation of deposition testimony to be used at trial to be filed	8/21/2018	10/20/2018
Objections and counter-designations to be filed	8/31/2018	10/30/2018
Motions in limine to be filed	8/21/2018	10/20/2018
Requested voir dire to be filed	8/21/2018	10/20/2018
Trial briefs to be filed	8/21/2018	10/20/2018
Requested jury instructions to be filed	8/21/2018	10/20/2018
Final Pretrial Report to be submitted to the court	8/21/2018	10/20/2018

Relief Requested: The Parties respectfully request this Court enter an Order extending the deadlines to the proposed dates, as set forth in the chart above.

s/Courtney Warmington (w/perm)

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**CERTIFICATE OF MAILING**

This is to certify that on this 17<sup>th</sup> day of April, 2018, a true and correct copy of the foregoing instrument was electronically transmitted to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the following ECF registrants:

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s/LEAH M. ROPER

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